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SOUTHERN DISTRICT OF CALIFORNIA

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

January 2007 Grand Jury

UNITED STATES OF AMERICA,) Criminal Case No. 07CR3471-JAH
)
Plaintiff,) I N D I C T M E N T
) (Superseding)
v.)
RICARDO FLORES,) Title 8, U.S.C., Secs. 1326(a)
) and (b) - Attempted Entry After
Defendant.) Deportation; Title 18, U.S.C.,
) Sec. 1028A(a)(1) - Aggravated
) Identify Theft; Title 18, U.S.C.,
) Sec. 1546(a) - Fraud and Misuse
) of Entry Document

The grand jury charges:

Count 1

On or about November 4, 2007, within the Southern District of California, defendant RICARDO FLORES, an alien, knowingly and intentionally attempted to enter the United States of America with the purpose, i.e., conscious desire, to enter the United States without the express consent of the Attorney General of the United States or his designated successor, the Secretary of the Department of Homeland Security, after having been previously excluded, deported and removed from the United States to Mexico, and not having obtained said express consent to reapply for admission thereto; and committed an overt act to wit, crossing the border from Mexico into the United States, that was a substantial step toward committing the offense, all in violation of Title 8, United States Code, Sections 1326(a) and (b).

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1 It is further alleged that defendant RICARDO FLORES was removed
2 from the United States subsequent to October 26, 2006.

3 Count 2

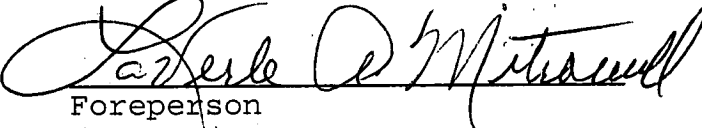
4 On or about November 4, 2007, within the Southern District of
5 California, defendant RICARDO FLORES, during and in relation to a
6 violation of Title 8, United States Code, Sections 1326(a) and (b),
7 knowingly possessed and used, without lawful authority, a means of
8 identification of another person, to wit: United States Permanent
9 Resident Card in the name of Ricardo Flores that contained a valid
10 Alien Registration Number belonging to Veronica Trotman; in violation
11 of Title 18, United States Code, Section 1028A(a)(1).

12 Count 3

13 On or about November 4, 2007, within the Southern District of
14 California, defendant RICARDO FLORES, when applying for entry into the
15 United States at the Otay Mesa Port of Entry, California, did
16 knowingly use, attempt to use, utter, and possess a document
17 prescribed by statute or regulation for entry into the United States,
18 namely, United States Permanent Resident Card, bearing the name of
19 Ricardo Flores that contained a valid Alien Registration Number
20 belonging to Veronica Trotman, knowing it to have been unlawfully
21 obtained, in order to gain admission into the United States; in
22 violation of Title 18, United States Code, Section 1546(a).

23 DATED: February 28, 2008.

24 A TRUE BILL:

25 
26 Foreperson

27 KAREN P. HEWITT
United States Attorney

28 By: 

JOSEPH J. M. ORABONA
Assistant U.S. Attorney